

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Bishop Wayne R. Felton,
individually, and The Holy
Christian Church International,

Court File No. 23-cv-467
(DTS)

Plaintiffs,

v.

De'Mario Jives, individually, and
DeMajio Media LLC,

Defendants.

**DECLARATION OF WAYNE R.
FELTON REGARDING
DECEMBER 3, 2024 ORDER**

I, Bishop Wayne R. Felton, declare as follows:

1. I am a Plaintiff in this case and the Senior Pastor of *The Holy Christian Church International* ("Church"), based out of St. Paul, Minnesota.
2. Pursuant to the Court's Order dated December 3, 2024 (Dkt. No. 84), I respectfully do not agree that the Defendants have complied fully with this Court's Order.
3. My staff and I have conducted several searches of Defendants' online platforms for my name and/or the Church's name to determine whether all violative videos/posts have been removed. A non-exclusive list of the videos and posts still available as of 10:00am CST December 6, 2024 on Defendants' online platforms is attached hereto as **Exhibit A**. There may be additional content still posted on subscription-based platforms such as OnlyFans and Patreon, but I do not have access to those platforms so the information is unavailable to me.
4. I, through my counsel, previously provided lists of violative content several times to the Defendants even though I do not have an affirmative duty

under the Settlement Agreement (Dkt. No. 36) (hereinafter “Agreement”) to provide such information. The Defendants have an affirmative duty under the Agreement to “remove and delete all posts, statements, and other content concerning or related to Bishop Wayne R. Felton (“Bishop Felton”), his family, or Holy Christian Church International (“Church”).” (Dkt. No. 36) The Defendants have removed some content, but refuse to remove all content as required under the Agreement and by court order (See **Exhibit A**).

5. Two YouTube videos still available are particularly egregious violations of the Agreement, the Temporary Restraining Order (Dkt. No. 37) (“TRO”), the Preliminary Injunction (Dkt. No. 39) (“Injunction”), and the court’s most current order (Dkt. No. 84) (“Order”). They are: *CTV & Crew, Jives Nation: King Jives RESPONDS To \$75K Defamation Lawsuit* <https://www.youtube.com/watch?v=ZR63xFB3M> and *Good Morning Saint Aints and Friends* <https://www.youtube.com/watch?v=1KFc4Ww3eBs>.

6. The YouTube video, *CTV & Crew, Jives Nation: King Jives RESPONDS To \$75K Defamation Lawsuit*, still publicly broadcasts an image of my face. (See **Exhibit A**).

7. These videos have been previously listed on demand letters sent to the Defendants and filed with the Court. (See Exhibits B and D to Declaration of Pamela A. Dattilo in Support of Plaintiff’s Motion for Enforcement of Settlement and for Sanctions (Dkt. No. 45-2 listing YouTube video: *CTV & Crew, Jives Nation: King Jives RESPONDS To \$75K Defamation Lawsuit*; Dkt. No. 45-4 listing YouTube videos: *CTV & Crew, Jives Nation: King Jives RESPONDS To \$75K Defamation Lawsuit* and *Good Morning Saint Aints and Friends*)).

8. Defendants refuse to remove these links from social media even though they have been directed to do so by the terms of the Agreement and

were ordered to do so by the Court on multiple occasions, including in the Court's most recent Order (Dkt. No. 84.)

9. The Defendants have gone even further in potentially assisting to generate further content which would violate the Agreement and Order if posted directly by Defendant D'Mario Jives (hereinafter "Jives").

10. On December 3, 2024, an influencer named Consciouz TV posted a live video discussing this lawsuit. (See YouTube video *King Jives VS Bishop, "Wayne Felton" Lawsuit UPDATE! Has Jives F*CKED UP Or Is The Hype Real Dense?* <https://www.youtube.com/watch?v=4o0oZbd2HIU>, December 3, 2024, last accessed December 6, 2024).

11. In this video, Consciouz TV makes a myriad of incorrect and blatantly false statements. What is most concerning is that Consciouz TV purports to discuss the hearings on the Motions for Enforcement of Settlement and for Sanctions Hearing, which were held in person on November 12, 2024 (hereinafter "Hearing"). According to the docket, no one has requested a transcript of the Hearing. The only way Consciouz TV, a known ally of the Defendants, could purport to know what occurred at those hearings is through Jives. Among other things, Consciouz TV states:

- "Felton's party - his attorney - allegedly, these people did not bear any evidence when they accused Jives before a judge of live streaming [the] settlement agreement. There was zero proof of that." *Id.* at 23:09.
- "November the 12th was a rinse, and it was a wash, all right. Jives had already cleansed his platform, bleached his platform, purged his platform before November the 12. It was all done, all concluded, and the things that Felton tried to argue against Jives on the 12th once again were all a reach. All right. Now if you actually ***look at the transcript which is also provided in the docket that you can find over on Pacer - you can literally read the judge asking Felton what in the f**k do you want the plaintiff to do. Felton said I want him to remove the motherf**king***

*content so that's exactly what the h*ll Jives in fact did."* *Id.* at 24:55 [emphasis added, explicit language edited].

12. There is no record of what your Honor did or did not say on Pacer. Short of ordering a transcript, which is not reflected in the docket, the only way Consciouz TV could be privy to any information regarding the Hearing is through Jives.

13. Jives' refusal to remove and delete all social media content relating to or concerning myself, my family, and the Church coupled with further violations of the Agreement, TRO, the Injunction, the court instructions, and the Order continue to fuel the narrative online that Jives is "innocent," that I lost this lawsuit, that I in fact committed the heinous crimes Jives accused me of in his content, Jives will face no consequences because he is truthful, and the judicial system in this matter side with the Defendants.

I declare under penalty of perjury under the laws of the United States and the State of Minnesota that the foregoing is true and correct.

Executed on this 6th day of December 2024, in St. Paul, MN, County of Ramsey.

/s/ Wayne R. Felton

Bishop Wayne R. Felton